

MAY 26 1993

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

)
Amendment to Part 61 of the)
Commission's Rules Requiring)
Metric Conversion of Tariff)
Publications and Supporting)
Information)

CC Docket 93-55

COMMENTS OF THE
NATIONAL TELEPHONE COOPERATIVE ASSOCIATION

The National Telephone Cooperative Association ("NTCA") submits these Comments in response to the Notice of Proposed Rulemaking, FCC 93-134, released on April 8, 1993, in the proceeding captioned above ("Notice"). This proceeding is examining proposals for the conversion of tariffs and supporting material to the metric system of weights and measures. NTCA is a national association of approximately 500 small local exchange carriers ("LECs") providing telecommunications services to interexchange carriers and subscribers throughout rural America.

The crux of the Commission's proposal is to offer the industry three options for the conversion of tariffs and supporting information.¹ The first option would require a conversion table in the general rules section of tariffs to convert from non-metric to metric-based units and rates and would allow reporting of non-metric units and rates in the body of tariffs and supporting information.² The second option would require dual reporting of both metric and non-metric units and

¹ Notice at paras. 6 and 7.

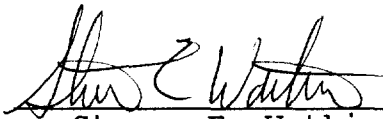
² Id. at para. 7.

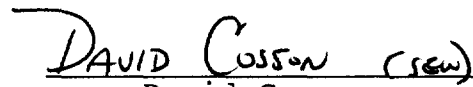
rates in tariffs and supporting information.³ The third option would require a conversion table but would require the reporting of metric units in tariffs and supporting information.⁴

NTCA agrees with the Commission's recognition that conversion to the metric system will place burdens on carriers and customers. The initial burdens from most observers' points of view will be without apparent benefits. NTCA supports the proposed balanced approach for carriers and customers which would allow the adoption of one of the three options for conversion. The first option, as the Commission concludes, would afford smaller carriers a less burdensome manner in which to meet national policy favoring conversion to the metric system.

Respectfully submitted,

NATIONAL TELEPHONE COOPERATIVE
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May 26, 1993

³ Id.

⁴ Id.

CERTIFICATE OF SERVICE

I, Rita H. Bolden, certify that a copy of the foregoing Comments of the National Telephone Cooperative Association in CC Docket No. 93-55 was served on this 26th day of May 1993, by first-class, U.S. Mail, postage prepaid, to the following persons on the attached list.

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